

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO *et al.*,

Debtors.<sup>1</sup>

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO ELECTRIC POWER AUTHORITY

Debtor.

X

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: PROMESA

: Title III

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: Case No. 17-BK-3283 (LTS)

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: (Jointly Administered)

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X

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: PROMESA

: Title III

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: Case No. 17-BK-4780 (LTS)

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: **This filing relates only to  
Case No. 17-BK-4780 (LTS)**

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X

**CERTIFICATE OF SERVICE**

I, Winnie Wu, hereby certify that I am over the age of eighteen years old and employed by Paul Hastings LLP and that on December 3, 2019, I caused to be served the following documents by sending a true and correct copy by e-mail on the parties listed on Exhibit A and by first class mail on the parties listed on Exhibit B. In addition, a true and correct copy of the following documents were electronically served via the CM/ECF system on all counsel of record.

<sup>1</sup> The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

- Official Committee of Unsecured Creditors' Reply in Support of Motion in Limine to Strike and Exclude Improper Lay Opinion Testimony of Frederic Chapados Regarding Alleged Effect of 9019 Settlement on PREPA Transformation **[Case No. 17-3283, Docket No. 9393 ; Case No. 17-4780 Docket No. 1793].**
- Urgent Motion to File Under Seal Official Committee of Unsecured Creditors' Reply in Support of Motion in Limine to Strike and Exclude Improper Lay Opinion Testimony of Frederic Chapados Regarding Alleged Effect of 9019 Settlement on PREPA Transformation **[Case No. 17-3283, Docket No. 9395 ; Case No. 17-4780 Docket No. 1794].**

Dated December 4, 2019

/s/ Winnie Wu  
Winnie Wu

**EXHIBIT A**  
Via E-mail

Description	Name	Notice Name	Address 1	Address 2	City	State	Postal Code	Email
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Adversary Proceeding 18- 00081, Defendant in Adv Case 19- 00014		Ortiz, David R. Rodríguez- Burns						
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Counsel to the Special Claims Committee of the Financial Oversight and Management Board for Puerto Rico, Acting By and Through Its Members	William Estrella Law Offices, PSC	Attn: Kenneth C. Suria	150 Tetuan	Old San Juan	San Juan	PR	00901	kcsuria@welo.net

Counsel to Softek, Inc. and Insight Management Group, Inc.,	William M. Vidal-Carvajal Law Office, P.S.C.	Attn: William M. Vidal-Carvajal, Esq.	MCS Plaza, Ponce de Leon Avenue	Suite 801	San Juan	PR	00917	william.m.vidal@gmail.com
Counsel to Comité Diálogo Ambiental, Inc., El Puente de Williamsburg, Inc.-Enlace Latino de Acción Climática, Comité Yabucoeño Pro-Calidad de Vida, Inc. (YUCAE), Alianza Comunitaria Ambientalista del Sureste, Inc., Sierra Club Puerto Rico, Inc., Mayagüezanos por la Salud y el Ambiente, Inc., Coalición de Organizaciones Anti Incineración, Inc. and Amigos del Río Guaynabo, Inc.	William Santiago-Sastre		P.O. Box 1801		Sabana Seca	PR	00952-1801	wssbankruptcy@gmail.com
Interested Party	William Santiago-Sastre, Esq.	Attn: William Santiago-Sastre, Esq.	USDCPR 201106	PO Box 1801	Sabana Seca	PR	00952-1801	wssbankruptcy@gmail.com

Counsel to Bettina Whyte, the COFINA Agent	Willkie Farr & Gallagher, LLP	Attn: Matthew A. Feldman, Joseph G. Minias, Martin L. Seidel, James C. Dugan, Jeffrey B. Korn, Tariq Mundiya, Paul V. Shalhoub, & Antonio Yanez, Jr.	787 Seventh Avenue		New York	NY	10019	mfeldman@willkie.com jminias@willkie.com mseidel@willkie.com jdugan@willkie.com jkorn@willkie.com tmundiya@willkie.com pshalhoub@willkie.com ayanez@willkie.com
Co-Counsel to Bank of America, N.A., Co-Counsel to Merrill Lynch, Pierce, Fenner & Smith Inc., Merrill Lynch, Pierce, Fenner & Smith Inc. and Merrill Lynch Capital Services, Inc.	Winston & Strawn LLP	Attn: Jennifer L. Malin, Carrie V. Hardman	200 Park Avenue		New York	NY	10166	jmalin@winston.com chardman@winston.com
Co-Counsel to Merrill Lynch, Pierce, Fenner & Smith Inc. and Merrill Lynch Capital Services, Inc.	Winston & Strawn LLP	Attn: Joseph L. Motto	35 W. Wacker Drive		Chicago	IL	60601	jmotto@winston.com
Counsel to Autonomous Municipality of San Juan, Intervenor in Adversary Proceeding 19-	Winston & Strawn LLP	Attn: Julissa Reynoso	200 Park Avenue		New York	NY	10166	jreynoso@winston.com

00393								
Counsel to KDC Solar, LLC	Wollmuth Maher & Deutsch LLP	Attn: James Lawlor, Esq.	200 Madison Ave		Morristown	NJ	07960	JLawlor@wmd-law.com
Counsel to Popular, Inc., Popular Securities, LLC and Banco Popular de Puerto Rico	Young Conaway Stargatt & Taylor, LLP	Attn: James L. Patton, Robert S. Brady	Rodney Square	1000 North King Street	Wilmington	DE	19801	jpatton@ycst.com rbrady@ycst.com

**Exhibit B**  
Via First Class Mail

Description	Name	Notice Name	Address 1	Address 2	City	State	Postal Code
Defendant in Adversary Proceeding 19-00296	Alan Friedman		124 Lander Ave.		Staten Island	NY	10314
Federal Agency	AmeriCorps	Attn: Kim Mansaray	1201 New York Ave., NW		Washington	DC	20525
Antilles Power Depot, Inc.	Antilles Power Depot, Inc.	Attn: Raymond Texidor	PO Box 810190		Carolina	PR	00981-0190
Counsel to Asociación de Profesoras y Profesores del Recinto Universitario de Mayagüez, Inc.	Asociación de Profesoras y Profesores del Recinto Universitario de Mayagüez, Inc.		Apartado Postal 2227		Mayagüez	PR	00681
Counsel to Aida Rossy Clemente	Carlos Alsina Batista Law Offices, PSC	Attn: Carlos C. Alsina Batista	1519 Ponce De León Ave.	Firstbank Bldg., Suite 513	San Juan	PR	00909
Intervenor in Adversary Proceeding 17-00250	Cohen, Weiss and Simon LLP	Attn: Hiram M. Arnaud	900 Third Ave	21st Floor	New York	NY	10022
PBA Top 20 Creditor	Correction Corporation of America	Attn: President or General Counsel	10 Burton Hills Boulevard		Nashville	TN	37215
Plaintiff in Adv. Proc. No. 19-00364	Davidson Kempner Capital Management LP		520 Madison Avenue	30th Floor	New York	NY	10022
Puerto Rico Department of Justice	Departamento de Justicia de Puerto Rico		Apartado 9020192		San Juan	PR	00902-0192
Federal Agency	Department of Defense (DOD)	Attn: Patrick Shanahan	1400 Defense Pentagon		Washington	DC	20301-1400

Federal Agency	Department of Energy (DOE)	Attn: Rick Perry	1000 Independence Ave., SW		Washington	DC	20585
Federal Agency	Department of Homeland Security (DHS)	Attn: Kirstjen M. Nielsen	245 Murray Lane., SW		Washington	DC	20528-0075
Federal Agency	Department of Housing and Urban Development (HUD)	Attn: Ben Carson	451 7th Street., SW		Washington	DC	20410
Federal Agency	Department of Human and Health Services	Attn: Alex Azar	200 Independence Ave, SW		Washington	DC	20201
Federal Agency	Department of the Interior (DOI)	Attn: David Bernhardt	1849 C St., NW		Washington	DC	20240
Federal Agency	Department of Transportation (DOT)	Attn: Elaine L. Chao	1200 New Jersey Ave., SE		Washington	DC	20590
Federal Agency	Department of Veterans Affairs (VA)	Attn: Robert Wilkie	810 Vermont Ave., NW		Washington	DC	20420
Federal Agency	Economic and Statistics Administrations	Attn: Brad Burke	1401 Constitution Ave., NW		Washington	DC	20230
Edgardo Seda Arroyo, Interested Party	Edgardo Seda Arroyo		35299-054, Federal Correctional Complex	UPS 2, PO Box 1034	Coleman	FL	33521-1034
Federal Agency	Federal Communications Commission (FCC)	Attn: Ajit Pai	445 12th St., SW		Washington	DC	20554
Federal Agency	Federal Emergency Management Agency (FEMA)	Attn: Bob Fenton	500 C St., SW		Washington	DC	20472
PBA Top 20 Creditor	G RG Engineering S E	Attn: President or General Counsel	Urb. Belisa 1515 Calle Bori		San Juan	PR	00928
Defendant	Ing. José F. Ortiz	Director	Avenida Ponce	Octavo Piso	Santurce	PR	00936-4267

	Vázquez	Ejecutivo de la Autoridad de Energía Eléctrica. S	de León, Parada 17 ½, Edificio NEOS				
Integrand Assurance Company	Integrand Assurance Company		PO Box 70128		San Juan	PR	00936-8128
Counselto PFZ Properties, Inc.	Jack Katz		ESJ Towers	6165 Isla Verde Ave	Carolina	PR	00979-5729
Jaime Rodríguez Avilés, Interested Party	Jaime Rodríguez Avilés		128 Apartament 201 Edificio Bernardo Torres	Sector La Trocha	Yauco	PR	00698
The Board of Trustees of the Puerto Rico Electric Power Authority Employees' Retirement System, Juan Carlos Adrover, Sammy Ramírez and Alvin Román	Junta de Síndicos del Sistema de Retiro de los Empleados de la Autoridad de Energía Eléctrica	Sistema de Retiro AEE	PO Box 13978		San Juan	PR	00908-3978
Counselto Kanoso Auto Sales Inc.	Kanoso Auto Sales Inc.	Attn: Jose A. Crespo Gonzalez, President	PO Box 1446		San German	PR	00683
Interested Party	Liberty Cablevision of Puerto Rico, LLC	Attn: Alexandra Verdiales	PO Box 192296		San Juan	PR	00919-2296
Counselto Cooperativa A/C, et.al	Marichal, Hernandez, Santiago & Juarbe, LLC	Attn: Rafael M. Santiago-Rosa & Vanessa Medina-Romero	PO Box 190095		San Juan	PR	00919-0095
Counselto Cooperativa A/C, et.al	Marichal, Hernandez, Santiago & Juarbe, LLC	Attn: Rafael M. Santiago-Rosa & Vanessa Medina-	Triple S Plaza, 1510 F.D. Roosevelt Ave.	9th Floor, Suite 9 B1	Guaynabo	PR	00968

		Romero					
Counsel to Metro Pavia Health System	Metro Pavia Health System	Attn: Zarel J Soto Acaba	PO Box 3180		Carolina	PR	00984
PBA Top 20 Creditor	Muniz Burgos Contractors, Corp.	Attn: President or General Counsel	Condominio Parque De Las Fuentes PH204	680 Calle Cesar Gonzalez	San Juan	PR	00918-3912
Counsel to Pablo Del Valle Rivera and María A. Martínez, Tenants in Common and Fideicomiso Del Valle Martinez II	Pablo Del Valle Rivera		PO Box 2319		Toa Baja	PR	00951-2319
Debtors	Puerto Rico Electric Power Authority	Attn: Office Of The General Counsel	PO Box 364267		San Juan	PR	00936-4267
Members of Creditor's Committee	Puerto Rico Hospital Supply		Call Box 158		Carolina	PR	00986-0158
Puerto Rico Industrial Development Company	Puerto Rico Industrial Development Company	Attn: Gabriel Maldonado	PO Box 362350		San Juan	PR	00936-2350
PBA Top 20 Creditor	Quintero Construction S E	Attn: President or General Counsel	Carr 734 Km 0.5 Bo Arenas		Cidra	PR	00739
Reliable Equipment Corporation	Reliable Equipment Corporation	Attn: Marylin Del Valle, General Manager, Reliable Equipment Corporation	PO Box 2316		Toa Baja	PR	00951-2316
Rene Pinto-Lugo, et al., Plaintiff in	Rene Pinto-Lugo		PO Box 13531		San Juan	PR	00908

Adversary Proceeding 18-00041							
Ricardo Rosello Nevares, Defendant in Adversary Proceeding 17-00250 and 18-00053	Ricardo Rosello Nevares	Through the Secretary of Justice	Calle Fortaleza #63		Viejo San Juan	PR	00901
Federal Agency	Small Business Administration (SBA)	Attn: Linda McMahon	409 3rd St., SW		Washington	DC	20416
SOMOS, Inc.	SOMOS, Inc.		1605 Ponce De Leon Avenue	Suite 300, San Martin Bldg.	San Juan	PR	00909
Members of Creditor's Committee	The American Federation of Teachers (AFT)	Attn: Mark Richard	555 New Jersey Ave., NW	11th Floor	Washington	DC	20001
Debtors	The Commonwealth of Puerto Rico	Office of the Governor	La Fortaleza	63 Calle Fortaleza	San Juan	PR	00901
Unión de Médicos de la Corporación del Fondo del Seguro del Estado	Unión de Médicos de la Corporación del Fondo del Seguro del Estado		PO Box 70344, CMM33		San Juan	PR	00936-8344
Members of Creditor's Committee	Unitech Engineering	Attn: Ramón Ortiz Carro	Urb Sabanera	40 Camino de la Cascada	Cidra	PR	00739
Federal Agency	US Army Corps of Engineers	Attn: Todd T. Semonite	441 G St., NW		Washington	DC	20548
Office of the United States Attorney for the District of Puerto Rico	US Attorney for the District of Puerto Rico	Attn: Rosa E. Rodriguez-Velez, U.S. Attorney	Torre Chardón, Suite 1201	350 Carlos Chardón Street	San Juan	PR	00918
Federal Agency	US Department of Agriculture	Attn: Sonny Perdue	1400 Independence Ave., SW		Washington	DC	20250
Federal Agency	US Department of Commerce	Attn: Wilbur Ross	1401 Constitution Ave., NW		Washington	DC	20230

Federal Agency	US Department of Education (ED)	Attn: Betsy DeVos	400 Maryland Ave., SW		Washington	DC	20202
Federal Agency	US Department of Health and Services	Attn: Amanda Barlow	330 C St., SW		Washington	DC	20201
Federal Agency	US Department of Justice (DOJ)	Attn: William Barr	950 Pennsylvania Ave., NW		Washington	DC	20530
Federal Agency	US Department of Labor (DOL)	Attn: Alexander R. Acosta	Office of the Solicitor, N-2700	Frances Perkins Building, 200 Constitution Ave	Washington	DC	20210